

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re:	§	
	§	
DAVID G. WALLACE, JR.,	§	15-31594-H4-7
Debtor,	§	
	§	
ZT WEALTH DEVELOPMENT, L.P.	§	
	§	
Plaintiff,	§	Adv. No. 15-03242
	§	
v.	§	
	§	
DAVID G. WALLACE, JR.,	§	
Defendant.	§	

**ZT DEFENDANTS' ANSWER TO
PLAINTIFF-INTERVENOR'S ORIGINAL COMPLAINT**

TO THE HON. JEFF BOHM
CHIEF UNITED STATES BANKRUPTCY JUDGE:

COME NOW, ZT Wealth Development, L.P., Taseer Badar, Altus Healthcare Management L.P., Altus HMS II L.P., Altus Hospice of Houston L.P., Altus Medical Equipment Services L.P., Altus Radiation Billing & Management L.L.P., Altus Radiation Oncology (Baytown) L.P., Clarus Billing & Management L.P., Clarus Imaging (Baytown), L.P., Clarus Imaging (Beaumont), L.P., True View Realty Partners One L.P., True View Realty Partners Two L.P., True View Realty Partners Three L.P., ZT Group Business Center One (Pearland) L.P., and ZT Shadow Creek Partners L.P. (collectively, the "ZT Defendants"), and file their Answer to the Plaintiff-Intervenor's Original Complaint filed by the Trustee, incorporates the Complaint filed by ZT Wealth Development, L.P. in this cause to the extent that it explains the falsity of the Trustee's allegations, and would further show unto the Court as follows:

1. The ZT Defendants Admit the averments of this paragraph.

2. The ZT Defendants Admit the averments of this paragraph.
3. The ZT Defendants Admit the averments of this paragraph.
4. The ZT Defendants Admit the averments of this paragraph.
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16. The ZT Defendants Admit the averments of this paragraph.
17. The ZT Defendants Admit the averments of this paragraph.
18. The ZT Defendants Admit the averments of this paragraph.
19. The ZT Defendants Admit the averments of this paragraph.
20. The ZT Defendants Admit the averments of this paragraph.
21. The ZT Defendants Admit the averments of this paragraph.
22. The ZT Defendants Admit the averments of this paragraph.
23. Defendants are not required to admit or deny this paragraph, but to the extent an answer is required, Defendants deny the facts that underlie the Complaint.

24. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in paragraph 24.

25. The ZT Defendants deny the allegations in Paragraph 25, except that the ZT Defendants admit that, at one time, Wallace had equity interests in the ZT Defendants that are entities.

26. The ZT Defendants deny the allegations in Paragraph 26.

27. The ZT Defendants admit the averments of this paragraph.

28. The ZT Defendants admit the averments of paragraph 28, except that it is incomplete and the ZT Defendants deny that Defendant Badar approached Wallace and asked Wallace to assist him with “building and growing the ZT Wealth Entities.”

29. The ZT Defendants deny the averments of this paragraph.

30. The ZT Defendants deny the averments of this paragraph.

31. The ZT Defendants admit the first sentence of the paragraph and deny the second sentence of the paragraph.

32. The ZT Defendants admit the averments of this paragraph, except that the ZT Defendants deny that Wallace worked for the ZT Wealth Entities in any significant capacity.

33. The ZT Defendants deny the averments of this paragraph.

34. The ZT Defendants deny the averments of this paragraph.

35. The ZT Defendants admit the averments of this paragraph.

36. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in paragraph 36.

37. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

38. The ZT Defendants deny the averments of this paragraph.

39. The ZT Defendants admit the averments of this paragraph that a memorandum of understanding was drafted that described a hypothetical agreement between the parties, but the ZT Defendants did not agree to the terms of the ZT Development MOU and no agreement was ever consummated.

40. The ZT Defendants admit that they were not interested in working with Mr. Wallace if he was engaged in a partnership with Mr. Bajjali, but the ZT Defendants state that other conditions to any such arrangement existed and were never met..

41. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

42. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the first sentence in paragraph 42. The ZT Defendants deny the remainder of this paragraph, except that the ZT Defendants admit that Mr. Bajjali spoke with Mr. Badar about the situation with Mr. Wallace in 2014.

43. The ZT Defendants deny the averments of this paragraph.

44. The ZT Defendants admits the averments of this paragraph 44, except that they deny that Badar told Wallace that the ZT Wealth Equity Interests were worth at least \$500,000.00.

45. The ZT Defendants admit the averments of this paragraph.

46. The ZT Defendants deny the averments of this paragraph.

47. Defendants need not admit or deny this paragraph.

48. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

49. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

50. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

51. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

52. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

53. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

54. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

55. Defendants need not admit or deny this paragraph.

56. The ZT Defendants deny the averments of this paragraph.

57. The ZT Defendants deny the averments of this paragraph.

58. The ZT Defendants deny the averments of this paragraph.

59. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

60. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

61. The ZT Defendants deny the averments of this paragraph.

62. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

63. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

64. Defendants need not admit or deny this paragraph.

65. The ZT Defendants admit the averments of this paragraph.

66. The ZT Defendants deny the averments of this paragraph.

67. The ZT Defendants deny the averments of this paragraph.

68. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

69. The ZT Defendants deny the averments of this paragraph.

70. Defendants need not admit or deny this paragraph.

71. The ZT Defendants admit the averments of this paragraph.

72. The ZT Defendants deny the averments of this paragraph.

73. The ZT Defendants deny the averments of this paragraph.

74. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

75. The ZT Defendants deny the averments of this paragraph.

76. Defendants need not admit or deny this paragraph.

77. The ZT Defendants admit the averments of this paragraph.

78. The ZT Defendants deny the averments of this paragraph.

79. The ZT Defendants deny the averments of this paragraph.

80. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

81. The ZT Defendants deny the averments of this paragraph.

82. Defendants need not admit or deny this paragraph.

83. The ZT Defendants admit the averments of this paragraph.

84. The ZT Defendants deny the averments of this paragraph.

85. The ZT Defendants deny the averments of this paragraph.

86. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

87. The ZT Defendants deny the averments of this paragraph.

88. Defendants need not admit or deny this paragraph.

89. The ZT Defendants admit the averments of this paragraph.

90. The ZT Defendants deny the averments of this paragraph.

91. The ZT Defendants deny the averments of this paragraph.

92. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

93. The ZT Defendants deny the averments of this paragraph.

94. Defendants need not admit or deny this paragraph.

95. The ZT Defendants admit the averments of this paragraph.

96. The ZT Defendants deny the averments of this paragraph.

97. The ZT Defendants deny the averments of this paragraph.

98. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

99. The ZT Defendants deny the averments of this paragraph.

100. Defendants need not admit or deny this paragraph.

101. The ZT Defendants admit the averments of this paragraph.

102. The ZT Defendants deny the averments of this paragraph.

103. The ZT Defendants deny the averments of this paragraph.

104. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

105. The ZT Defendants deny the averments of this paragraph.

106. Defendants need not admit or deny this paragraph.

107. The ZT Defendants admit the averments of this paragraph.

108. The ZT Defendants deny the averments of this paragraph.

109. The ZT Defendants deny the averments of this paragraph.

110. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

111. The ZT Defendants deny the averments of this paragraph.

112. Defendants need not admit or deny this paragraph.

113. The ZT Defendants admit the averments of this paragraph.

114. The ZT Defendants deny the averments of this paragraph.

115. The ZT Defendants deny the averments of this paragraph.

116. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

117. The ZT Defendants deny the averments of this paragraph.

118. Defendants need not admit or deny this paragraph.

119. The ZT Defendants admit the averments of this paragraph.

120. The ZT Defendants deny the averments of this paragraph.

121. The ZT Defendants deny the averments of this paragraph.

122. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

123. The ZT Defendants deny the averments of this paragraph.

124. Defendants need not admit or deny this paragraph.

125. The ZT Defendants admit the averments of this paragraph.

126. The ZT Defendants deny the averments of this paragraph.

127. The ZT Defendants deny the averments of this paragraph.

128. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

129. The ZT Defendants deny the averments of this paragraph.

130. Defendants need not admit or deny this paragraph.

131. The ZT Defendants admit the averments of this paragraph.

132. The ZT Defendants deny the averments of this paragraph.

133. The ZT Defendants deny the averments of this paragraph.

134. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

135. The ZT Defendants deny the averments of this paragraph.

136. Defendants need not admit or deny this paragraph.

137. The ZT Defendants admit the averments of this paragraph.

138. The ZT Defendants deny the averments of this paragraph.

139. The ZT Defendants deny the averments of this paragraph.

140. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

141. The ZT Defendants deny the averments of this paragraph.

142. Defendants need not admit or deny this paragraph.

143. The ZT Defendants admit the averments of this paragraph.

144. The ZT Defendants deny the averments of this paragraph.

145. The ZT Defendants deny the averments of this paragraph.

146. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

147. The ZT Defendants deny the averments of this paragraph.

148. Defendants need not admit or deny this paragraph.

149. The ZT Defendants admit the averments of this paragraph.

150. The ZT Defendants deny the averments of this paragraph.

151. The ZT Defendants deny the averments of this paragraph.

152. The ZT Defendants lack knowledge or information sufficient to form a belief as to the veracity of the allegations in this paragraph.

153. The ZT Defendants deny the averments of this paragraph.

154. Defendants need not admit or deny this paragraph.

155. The ZT Defendants deny the averments of this paragraph.

156. The ZT Defendants deny the averments of this paragraph.

157. The ZT Defendants deny the averments of this paragraph.

158. The ZT Defendants deny the averments of this paragraph.

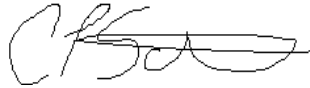
159. The ZT Defendants deny the averments of this paragraph.

160. Defendants need not admit or deny this paragraph.

WHEREFORE PREMISES CONSIDERED THE PLAINTIFF respectfully requests that this Court enter judgment that the Trustee take nothing in its claims against the ZT Defendants.

Submitted this 20th day of April, 2016.

Respectfully submitted,



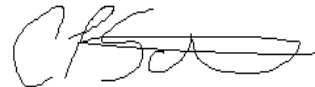
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OF COUNSEL:
Schmidt Law Firm, PLLC

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all counsel of record via ECF.



C. Thomas Schmidt